

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

<p>DEAN OBEIDALLAH,</p> <p>Plaintiff,</p> <p>v.</p> <p>ANDREW B. ANGLIN, DBA <i>Daily Stormer</i>,</p> <p>and</p> <p>MOONBASE HOLDINGS, LLC, DBA Andrew Anglin,</p> <p>and</p> <p>JOHN DOES NUMBERS 1–10, Individuals who also assisted in the publication or representation of false statements regarding Mr. Obeidallah,</p> <p>Defendants.</p>	<p>CASE NO. 2:17-CV-00720-EAS-EPD</p> <p>Chief Judge Edmund A. Sargus</p> <p>Magistrate Judge Elizabeth Preston Deavers</p>
<p>PLAINTIFF’S PROPOSED REQUESTS FOR PRODUCTION OF DOCUMENT AND THINGS</p>	

Plaintiff Dean Obeidallah submits the following document requests (which will accompany subpoenas duces tecum) in support of his Motion for Additional Discovery in Aid of Default Judgment. For sake of brevity, Mr. Obeidallah has foregone providing the Court with definitions, instructions, and other portions of the proposed subpoenas which are ancillary to assessing whether the requests are appropriately tailored to the relief requested and minimize the burden on the requested party. Mr. Obeidallah is happy to submit complete copies of the subpoenas duces tecum upon the Court’s request.

I. BANK 1¹

A. Documents to Be Produced

1. Documents sufficient to show the transactional information during the Relevant Period², including dollar value, date, deposit slips, and images, of any checks deposited into or withdrawn from any account associated with: (a) Andrew B. Anglin; or (b) Moonbase Holdings, LLC.
2. Documents sufficient to show the transactional information during the Relevant Period, including dollar value, date, and deposit slips, of any cash deposited into or withdrawn from any account associated with: (a) Andrew B. Anglin; or (b) Moonbase Holdings, LLC.
3. Documents sufficient to show the history of account balances and transactions during the Relevant Period, including amounts that have been deposited or withdrawn, and merchant names and transaction descriptions, for any account associated with: (a) Andrew B. Anglin; or (b) Moonbase Holdings, LLC.

II. BANK 2

A. Documents to Be Produced

1. Documents sufficient to show the transactional information during the Relevant Period, including dollar value, date, recipient, and images, of any checks withdrawn from or deposited into any account associated with Gregory Mark Anglin where the transaction involved one or more of the following parties: (a) Andrew B. Anglin; (b) Moonbase Holdings, LLC; (c) the Daily Stormer; (d) GoDaddy; (e) Zappitelli CPA Inc.; (f) the U.S. Postal Service; or (g) the Ohio Secretary of State.
2. Documents sufficient to show the transactional information during the Relevant Period, including dollar value, date, and any associated deposit slips or receipts, of any cash withdrawn from or deposited into any account associated with Gregory Mark Anglin.
3. Documents sufficient to show the transactional information during the Relevant Period, including dollar value, date, merchant name, and description, of any credit or debit account associated with Gregory Mark Anglin where the transaction involved one or more of the following parties: (a) Andrew B.

¹ Due to the controversial nature of the *Daily Stormer*, Mr. Obeidallah is not naming the financial institutions that have likely received donations from Defendants Andrew B. Anglin and Moonbase Holdings, LLC in this document. Mr. Obeidallah is happy to provide this information to the Court at its request.

² Mr. Obeidallah proposes defining “Relevant Period,” as used in each request, as March 1, 2013 to present.

Anglin; (b) Moonbase Holdings, LLC; (c) the Daily Stormer; (d) GoDaddy; (e) Zappitelli CPA Inc.; (f) the U.S. Postal Service; or (g) the Ohio Secretary of State.

III. BANK 3

A. Documents to Be Produced

- 1.** Documents sufficient to show the transactional information during the Relevant Period, including dollar value, date, recipient, and images, of any checks withdrawn from or deposited into any account associated with Gregory Mark Anglin where the transaction involved one or more of the following parties: (a) Andrew B. Anglin; (b) Moonbase Holdings, LLC; (c) the Daily Stormer; (d) GoDaddy; (e) Zappitelli CPA Inc.; (f) the U.S. Postal Service; or (g) the Ohio Secretary of State.
- 2.** Documents sufficient to show the transactional information during the Relevant Period, including dollar value, date, and any associated deposit slips or receipts, of any cash withdrawn from or deposited into any account associated with Gregory Mark Anglin.
- 3.** Documents sufficient to show the transactional information during the Relevant Period, including dollar value, date, merchant name, and description, of any credit or debit account associated with Gregory Mark Anglin where the transaction involved one or more of the following parties: (a) Andrew B. Anglin; (b) Moonbase Holdings, LLC; (c) the Daily Stormer; (d) GoDaddy; (e) Zappitelli CPA Inc.; (f) the U.S. Postal Service; or (g) the Ohio Secretary of State.